

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

RONALD DALLEY

Debtor

CASE NO. 5-15-05200

CHAPTER 13

FIFTH THIRD BANK

Movant,

vs.

RONALD DALLEY

Respondents.

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM  
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, Ronald Dalley, and files an Answer to Fifth Third Bank's Motion for Relief From the Automatic Stay:

1. Mark and Janice Gibbons, (hereinafter the "Debtors") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Charles J. DeHart, III, Esq. was appointed the Chapter 12 Trustee.
3. Movant alleges that Debtors have failed to make monthly car loan payments.
4. Under the Chapter 13 Plan, Movant's claim is being paid in full through the Chapter 13 Plan, as the loan has matured.
5. Movant is not entitled to relief from the automatic stay as Movant's claim is being paid in full through the Chapter 13 Plan, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: August 16, 2016

/s/Tullio DeLuca  
Tullio DeLuca, Esquire  
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**CERTIFICATE OF SERVICE**  
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The undersigned hereby certifies that on August 16, 2016, he caused a true and correct copy of Debtor's Answer to Fifth Third Bank's Motion for Relief from the Automatic Stay to be served via electronic filing to the CM/ECF participant at the following:

Charles J. DeHart, III, Esq. at [dehartstaff@ramapo.com](mailto:dehartstaff@ramapo.com)

[Joseph Dessoye, Esq. at joseph.dessoye@phelanhallinan.com](mailto:joseph.dessoye@phelanhallinan.com)

Date: August 16, 2016

/s/Tullio DeLuca  
Tullio DeLuca, Esq.